

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORY APWU/USPS-T1-15**
(July 5, 2012)

The United States Postal Service files this partial objection to the above-identified Interrogatory to witness Jeffrey C. Day of the American Postal Workers Union, AFL-CIO (APWU) filed on June 28, 2012. The interrogatory is stated verbatim and followed by a statement of the basis for the objection.

APWU/USPS-T1-15.

The timeline on page 22 of your testimony indicates that upgrades of Post Offices will be completed in June 2012. How many upgrades does the Postal Service anticipate will take place in the POSTPlan offices by June 30, 2012?

The Postal Service objects to this interrogatory because it misstates the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1) and thereby assumes a fact not in evidence. The referenced timeline on page 22 of the testimony states that “[t]he Postal Service will begin upgrading POSTPlan Offices” in June 2012. The testimony does not support the interrogatory’s assertion that that the upgrades will be completed in June 2012.

Nonetheless, the Postal Service will respond to the above identified interrogatory by interpreting the question consistently with the statements in the testimony.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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